



Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & Water Management Alliance

In relation to comments made as part of the first Regulation 19 consultation

November 2025

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1. Introduction

The first Regulation 19 consultation on the Local Plan for the Broads was held over the summer in 2025. This is one of a series of Statements of Common Ground that relate to comments made as part of that consultation. The comments are included, as well as response from the Broads Authority. If a change is proposed, that is also included.

There is a section relating to areas of agreement and areas of disagreement.

2. Areas of agreement

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
Policy PUBDM9: Surface water run-off	Not specified	Not specified	Not specified	I note that the Broads IDB Development page on the WMA website has been provided. Whilst I am pleased to see that the IDB is being signposted, I'd like to highlight that whilst the most prominent IDB within the Broads in terms of area covered is the Broads (2006) IDB, the area covered by the Broads Authority is also partially coincidental with the Norfolk Rivers IDB (Belaugh to Ranworth, and West of the North Walsham and Dilham Canal) and the Waveney, Lower Yare and Lothingland IDB (South of the River Yare from the East of Rockland St Mary to Great Yarmouth).	It may be more beneficial to direct users of the plan to the WMA website (https://www.wlma.org.uk/) from which they can access maps and our contact details to determine which Board's area a development falls into, if any.	Agree with proposed change.	<u>From the WMA website (https://www.wlma.org.uk/) you can access maps and contact details to determine which IDB area a development falls into, if any.</u>
Policy PUBDM9: Surface water run-off	Not specified	Not specified	Not specified	WMA officers are open to and actively support early engagement in the drainage design process to support developers in achieving sustainable drainage, as well as reducing the risk of conflict between the Board's regulation and that of Local Planning Authorities.	Within the 'Designing SuDS' section on page 77, I'd request that the IDBs are referenced as regulators of surface water discharges within IDD's as per Byelaw 3 in each of the Boards' Byelaws.	Agree with proposed change.	<u>Watercourses in the Broads Internal Drainage Board's Internal Drainage District are regulated by the Internal Drainage Board and maintained by the IDB or by private landowners. Development affecting watercourses is likely to require Consent under the Land Drainage Act 1991 and the Board's Byelaws. WMA officers are open to and actively support early engagement in the drainage design process to support developers in achieving sustainable drainage, as well as reducing the risk of conflict between the Board's regulation and that of Local Planning Authorities. IDBs are regulators of surface water discharges within IDD's.</u>
Policy PUBDM8: Development and flood risk	Not specified	Not specified	Not specified	On page 73 beneath policy PUBDM8, I am pleased to see that Section 23 of the Land Drainage Act 1991 has been referenced regarding any proposal to alter a watercourse. I would like to note that the Boards are only the regulator of Section 23 within their IDD's, whilst the legislation applies to any ordinary watercourse, in or out of an IDB's district. I understand that the Lead Local Flood Authority is the regulator of works to ordinary watercourses outside the Boards' districts in the Broads area.	Not seeking changes	Support noted.	No change proposed.

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 11 November 2025

For Water Management Alliance: Ellie Roberts, Senior Sustainable Development Officer, 11 November 2025